

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF IOWA**

|                       |   |
|-----------------------|---|
| IN RE:                | Chapter 11                                  |
| BDC Group Inc.,       | Bankruptcy No. 23-00484                     |
| Debtor-in-Possession. | <b>MOTION TO REJECT UNEXPIRED<br/>LEASE</b> |

COMES NOW the Debtor-in-Possession, BDC Group Inc., through its undersigned counsel, and hereby respectfully requests this Court authorize it to reject the lease it has with Youngwood Lane LLC, stating the following in support:

1. Debtor and Youngwood Lane LLC are parties to a lease agreement for Lot #40, 24050 Youngwood Lane, Aldie, VA 20105.
2. Debtor believes that all the collateral and valuable property previously stored at the Aldie lot has been removed.
3. Since Debtor no longer has any valuable property being stored at Lot #40, 24050 Youngwood Lane, Debtor wishes to reject the lease under 11 U.S.C. § 365(a).
4. Under 11 U.S.C. § 554(a) Debtor wishes to abandon any property left at the lot as of no or little value to the estate. Debtor believes there is little or nothing left at that site.

WHEREFORE the Debtor-in-Possession respectfully requests this Court authorize it to reject the lease it has with Youngwood Lane LLC, as described above, and grant such other relief as is just and equitable given the circumstances.

Dated this 7th day of December, 2023.

Respectfully submitted,

AG & BUSINESS LEGAL STRATEGIES

/s/Austin Peiffer

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ATTORNEY FOR DEBTOR-IN-POSSESSION

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 7th day of December, 2023, a copy of the foregoing document was filed with the Clerk of Court for the United States Bankruptcy Court for the Northern District of Iowa using the CM/ECF system, and served electronically on those participants that receive service through the CM/ECF system.

Youngwood Lane LLC  
44112 Mercure Circle  
Sterling, VA 20166

Signed: /s/ Alex C. Tvedte